AO 91 (Rev. 11/11) Criminal Complaint

Task Force Officer: Jason Modrzejewski, DEA

Telephone: (586) 203-7698

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Demondre Dorsey

Case: 2:20-mj-30367

Case No. Assigned To: Unassigned

Assign. Date: 9/10/2020

USA V. DORSEY (CMP)(CMC)

CRIMINAL COMPLAINT

On or about the date(s	s) of Sep	otember 9, 2020	in the county of _	Wayne in the
Eastern District of	of Michigan	, the defendar	nt(s) violated:	
Code Section		Offense Description		
21 U.S.C. § 841 (a)(1)		Possession with the intent to distribute heroin/fentanyl		
This criminal complaint is based on these facts: See attached affidavit				
Continued on the attached	i sheet.		9.0	·
			Complainan	_
			Jason Modrzejewski, Tas Printed nar	
Sworn to before me and signed in my presence and/or by reliable electronic means.			J. 50	
Date: 09/10/2020	_	· · · · · · · · · · · · · · · · · · ·	Judge's s	rignature
City and state: Detroit, MI			Yon. R. Steven Whalen, Uni	ited States Magistrate Judge

AFFIDAVIT

Your Affiant, Drug Enforcement Administration (DEA) Task Force Officer Jason Modrzejewski, being duly sworn, deposes and states the following:

- 1. I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. I have been employed by the Sterling Heights Police Department since October 2001, and assigned to the Drug Enforcement Administration (DEA), Detroit Field Division, since December 2016. I have received specialized training in various aspects of drug law enforcement and drug related asset investigations, including the identification, locating, seizure and forfeiture of proceeds derived from violations of State and Federal narcotics laws. I have personally been involved in numerous drug investigations. I have attended schools and seminars dealing with the use, sale. manufacture, identification and distribution of controlled substances. My primary duties are the investigation of controlled substance trafficking. During the course of my law enforcement experience, I have participated in complex investigations with drugtrafficking organizations dealing cocaine, heroin, marijuana and other controlled substances.
- 2. I am involved in an investigation of Demondre Dorsey. This affidavit is submitted in support of a criminal complaint charging Dorsey with possessing heroin/fentanyl mix with the intent to distribute, in violation of 21 U.S.C. § 841 (a)(1). The information contained in this affidavit does not describe the entirety of this investigation, but sets forth only those facts relevant and necessary to determining probable cause.
- 3. I make this affidavit, in part, based on personal knowledge derived from my participation in this investigation and, in part, based upon information from physical surveillance, electronic surveillance consisting of GPS vehicle tracking data and video surveillance, oral

- and written reports about this investigation and information that I have received from other law enforcement officers.
- 4. I have been investigating Demondre Dorsey and members of his Drug Trafficking Organization (DTO) since April 2019. During the course of the investigation I identified 44222 Apple Blossom, Sterling Heights, Michigan and the multi-unit residence at 12031/12033 Kennebec, Detroit, Michigan, as residences utilized by Dorsey to further his drug trafficking activities. I also identified two storage units located at 20979 Groesbeck Highway, Warren, Michigan (Storage Units 828 and 830) utilized by Dorsey. Through the use of physical surveillance and electronic surveillance consisting of video surveillance and GPS vehicle tracking data, I established Dorsey had dominion and control of all the locations listed above.
- 5. On September 8, 2020, I obtained a State of Michigan Search Warrant for 44222 Apple Blossom, Sterling Heights, Michigan, 12031/12033 Kennebec, Detroit, Michigan, 20979 Groesbeck Highway, Warren, Michigan (Storage Units 828 and 830) authorized by the Honorable Magistrate Michael Piatek. On September 9, 2020 the Search Warrant was conducted. Agents/Officers from DEA Detroit Enforcement Group 10 encountered Dorsey at 44222 Apple Blossom, Sterling Heights, Michigan. Agents/Officers found Dorsey to be in possession of approximately \$60,000 in United States Currency.
- 6. During the September 9, 2020, execution of the warrant, Agents/Officers DEA Detroit Enforcement Group 10 located and seized approximately 3 kilograms of suspected heroin/fentanyl mix in the single garage located behind 12031/12033 Kennebec, Detroit, Michigan. Nobody was at 12031/12033 Kennebec at the time of the execution of the warrant. Agents/Officers conducted a field test of the suspected heroin/fentanyl and received a positive response for fentanyl. I know from this investigation that Dorsey has prior felony convictions for Possession of cocaine/heroin (two separate convictions), delivery/manufacture cocaine/heroin 50-449 grams and

felony firearm, deliver imitation controlled substance, resist and obstruct, and flee and elude.

- 7. In summary, I have reviewed numerous hours of video surveillance and GPS vehicle tracking data showing Dorsey frequenting 12031/12033 Kennebec, Detroit, Michigan. Dorsey has also been observed entering/exiting the Kennebec location during physical surveillance. I have never observed anyone other than Dorsey enter 12031/12033 Kennebec. As recently as September 8, 2020, I observed Dorsey on the property at 12031/12033 Kennebec. Property records also indicate that Dorsey is the current owner of the property.
- 8. Based on the foregoing, I have probable cause to believe that on September 9, 2020 in the Eastern District of Michigan, Demondre Dorsey, possessed with the intent to distribute heroin/fentanyl, in violation of 21 U.S.C. § 841(a)(1).

Respectfully submitted,

Jason Modrzejewski, Task Force Officer Drug Enforcement Administration

Sworn to before me and signed in my presence and/or by reliable electronic means.

HONOKABLE R. STEVEN WHALEN

United States Magistrate Judge

Dated: September 10, 2020